

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EUGENE VOLOKH, RUMBLE CANADA
INC., and LOCALS TECHNOLOGY INC.,

Plaintiffs,

v.

LETITIA JAMES, in her official capacity as
New York Attorney General,

Defendant.

Civil Action No.: 1:22-cv-10195-ALC

**[Proposed] Order to Enforce
Preliminary Injunction**

Upon consideration of the Plaintiffs' Motion to Enforce Preliminary Injunction, IT IS
HEREBY ORDERED as follows:

- 1) New York Attorney General Letitia James shall promptly rescind her October 12, 2023 investigation letters through a public announcement on the Office of the New York Attorney General's website and by direct written communication with each recipient of those letters, with a copy of this order attached.
- 2) New York Attorney General Letitia James, on behalf of the State of New York, shall direct the State's officers, agents, successors, employees, and others acting in concert with her, to comply with this Court's February 14, 2023 Preliminary Injunction Order and therefore to refrain from, among other things, formally or informally investigating, requesting, or demanding information, documents, or testimony from "social media networks," as defined by the N.Y. Gen. Bus. Law § 394-ccc, regarding subjects that fall within the scope of that statute, including the policies, practices, methods, and actions of any "social media network" related to "hateful conduct," as defined by that statute.

Hon. Andrew L. Carter
United States District Judge

DATED: _____